

Florida Department of Juvenile Justice

1998
Monitoring Report

Pahokee Youth Development Center
and
Polk Youth Development Center

October 1998

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**1998 Monitoring Report
Pahokee Youth Development Center
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SECTION I — FACILITY INEQUITY

Background

The Pahokee Youth Development Center (YDC) and the Polk Youth Development Center (YDC) are both operated by the Correctional Services Corporation (CSC) under contract to the Florida Department of Juvenile Justice (DJJ). These monitors were retained by DJJ to conduct a series of monitoring reviews at both facilities during 1997 and 1998. The final on-site visits for 1998 were made at Pahokee YDC on October 7-9 and at Polk Youth Development Center October 12-14.

When one visits the two facilities in successive weeks, you are struck by the contrasts in the two sister facilities. It would be expected that the similarities would outweigh differences since the institutions are operated by the same vendor, were opened at the same time with identical contracts, have the same staffing pattern, and are constructed on an identical design. However, here the similarities end.

Polk Youth Development Center which houses the more serious offenders (level 8 versus level 6 at Pahokee) has better order, control and discipline. Polk has a more comprehensive behavior management program. Staff turnover is lower at Polk and most staff appear well trained, motivated and professional. Administratively, there is the ability to manage more effectively and get things accomplished in a more orderly and systematic manner.

Pahokee, on the other hand, appears to continue to operate in a crisis management mode. Staff turnover is high which adversely affects many areas of institutional operation. Continuity is lost and trained staff are replaced with new staff who have to be trained all over again.

Because of the contrasts between the two facilities, these monitors have decided to depart from the past practice of submitting separate reports on each facility and instead, submit one consolidated report on both. It is felt that by presenting the status of the two facilities side-by-side, the reader is lead to conclude first that the Pahokee YDC is disadvantaged by its geographic location. Secondly, as though the geographic location problem isn't enough to overcome in itself, it also appears that this facility has been disadvantaged due to a number of administrative decisions which have been made at a higher level.

Without looking at the total picture, one could easily conclude that facility managers are to blame. The quick fix would be to change managers and declare that things should now improve. We would strongly disagree with such a reaction. It was quite predictable from the beginning that Pahokee would be a much more difficult facility to operate than Polk. The Pahokee facility can be brought up to acceptable levels of operation, but in order to accomplish this goal it will have to be treated not just equally, but will have to be given preferential treatment. Just the opposite has occurred thus far as will be illustrated in this report.

Personnel

Entry Level Pay

Entry level salary for a Youth Worker I at Pahokee and Polk YDC's is identical at \$15,995 per year. In the initial "Start-Up Budget" allocated by DJJ in December of 1996, entry level pay was \$18,000 per year; however this was reduced by the vendor immediately after start-up to the current level of \$15,995. Other job classifications were treated in a similar fashion.

This starting pay is not competitive with pay for comparable work or with DJJ salaries in either geographic area. In order to attract and retain the type of staff needed to operate a facility of this kind, the pay ranges need to be increased to competitive levels.

Recommendation: Increase pay levels back to what was originally established by DJJ in the "Start-Up Budget" dated December 1996, and preferably to the level of comparable DJJ position(s).

Geographic Pay Differential

It is well established that a higher level of pay is needed in the Glades (Pahokee) area than in Polk County to attract and retain qualified staff. Housing is scarce in the Glades and the available labor pool is limited. The state has long recognized this and has paid a "geographic pay differential" to many classes of employees in this area. To pay the same salary at Pahokee as at Polk is a serious disadvantage to Pahokee.

Recommendation: Implement a "Geographic Pay Differential" to appropriate classes of staff at the Pahokee YDC.

Comment: These two recommendations concerning pay are the most important issues which need to be addressed if the goal is to bring Pahokee up to acceptable standards. Most other issues such as order, control, discipline, behavior management will begin to improve if the quality of staff improves.

Additional Staff

As a result of a meeting on September 22, 1998, between Rex Uberman of DJJ and Jim Irving of CSC, it was agreed that Pahokee YDC would add 20 part-time Youth Workers to provide additional coverage due to recent incidents of violence at that facility. As of the time of our visit, none had been employed yet due to the lack of an adequate labor pool. However, CSC also allocated 20 part-time staff to Polk YDC. As of the time of our visit on October 12, thirteen (13) part-time staff had been employed, trained and were on the job.

These monitors do not wish in any way to take anything away from Polk YDC because the additional staff supervision is certainly needed at that facility as well. However, it is ironic that a serious perceived shortage of staff supervision at Pahokee has resulted in additional staff supervision at Polk and none at Pahokee as of our visit.

Comment: This illustrates why the recommendations regarding pay and the geographic differential need to be addressed.

Recreation Facilities and Programs

The disparity which exists between Polk and Pahokee in recreational facilities and equipment is particularly striking as can be seen as follows:

Rope Course — Polk YDC has an almost fully completed "rope course" which was funded with revenue generated by the educational program. This is an obstacle course which is intended to develop physical ability and increase confidence. The "rope course" will be used as part of the P.E. program, the recreation program and in conjunction with the new Behavior Management Unit.

Pahokee does not have a similar "rope course."

Recreation Field — Polk YDC's recreation field is leveled and in use. Pahokee's recreation field is not prepared for use. It will cost much more to prepare this field for use since it is located in the Everglades. The Facility Administrator has not been able to identify funds to accomplish this.

Recreation Equipment — The housing units at Polk YDC have ping pong tables and a variety of table games available and in use by youth. At Pahokee there are no ping pong tables and few table games.

Recommendation: Immediately fund a "rope course" and preparation of the recreation field at Pahokee. Obtain indoor recreational items such as games and table tennis equal to that provided at Polk YDC.

Comment: When a youth activity such as "rope course" is approved at one facility, the same should be allocated for the other facility automatically.

At both facilities, the Recreation/Physical Education program is under the supervision of the school Principal. Both Principals feel it is their responsibility to provide a school based P.E. program as part of the regular school curriculum rather than a recreation and leisure time program. However, the contract clearly requires a recreation program as can be seen in Article 2.12.

*"Article 2.12. **Recreational and Leisure Time Activities**. The PROVIDER shall provide planned activities that are physically challenging, educational and constructive (i.e., activities that can be used by the youth after his release). Activities shall be provided that teach youth healthy ways to maintain their physical well-being in addition to providing alternative ways of spending leisure time. Opportunities for physical conditioning of each youth shall be a part of the overall recreational program. Indoor and outdoor activities shall be provided to all youth. Team work and fair play shall be stressed. Services provided shall comply with the DJJ Residential Commitment Services Manual (1996 Fall Edition)."*

Recommendation: Well rounded recreational and leisure time programs which extend beyond school based P.E. classes should be provided at both facilities.

Clothing and Shoes

The uniform shorts issued to youth at Polk YDC look better and appear to be more comfortable than those issued at Pahokee.

After an initial issue of poor quality shoes for youth, Polk YDC requested and received permission to purchase a better quality shoe and has been issuing these since the first of this year. The Facility Administrator at Pahokee requested permission to purchase a better quality shoe which request was denied.

Recommendation: Immediately upgrade the quality of clothing and shoes at Pahokee to the level at Polk.

Comment: When a uniform item is approved at one facility, it should automatically be approved at the other.

Security Cameras

To enhance security and supervision, DJJ funded and authorized a number of closed circuit television (CCTV) cameras and monitors at both facilities. The installation commenced first at Polk YDC and at the time of this monitoring visit the system was almost fully up and running and all that remained was to provide training on the system for the control room staff.

For reasons unknown to this monitor, Pahokee was scheduled second for installation of this equipment. At the time of our visit, installation crews were pulling wires, and no cameras or monitors had been installed.

Comment: Pahokee which is the facility experiencing supervision problems should be given priority if any other security staff or program enhancements are approved.

Pest Control

The monitors observed the presence of spiders and were told by youth of the presence of rodents in the facility. Medical records document instances of youth being bitten by spiders and rodents. The Facility Administrator acknowledges the presence of spiders and rodents and advises a request for increased service from the Pest Control contractor was submitted which request was denied in that it exceeded corporate standards.

Recommendation: Increase Pest Control treatments sufficient to bring this problem under control.

Comment: Because of the geographic area and the specific location of this facility (in the center of sugarcane fields), the normal frequency of pest control treatments at other facilities can be expected to be insufficient to meet the need at this location.

Visiting

Pahokee YDC — In reports of monitoring visits at this facility in 1997 concerns were raised about the extremely small visiting areas, the short period of time designated for visiting, the restrictions on movement, lack of access to vending machines, and the limitation on number of visitors. At a meeting with the DJJ Deputy Secretary for Operation in September of 1997, CSC committed to expand the visiting area to include an outside covered patio area.

In the "Special Report" on Pahokee YDC dated July 1998, the subject of visiting was again addressed due to concerns raised by the Youth Law Center. Excerpts from this July 1998 report are quoted below as follows:

"Outdoor space is available adjacent to the visiting park and an outdoor visiting area could be created by cutting a door through the wall. Also, a great deal of space is devoted to cubicles where visiting behind glass was intended. This space will probably not be used for this purpose and consideration should be given to eliminating these interior walls and opening up a much larger area for visiting and multiple other uses.

Visitors and youth are not allowed access to vending machines during the visit. It is recommended that consideration be given to affording parents the opportunity to treat their sons to drinks and snacks.

Visiting is limited to parents, grandparents or legal guardians unless special permission is granted allowing siblings or other relatives. So long as space is so limited, consideration cannot be given to relaxing this to any degree.

The visiting area is quite small and crowded. There is insufficient space to allow youth and parents to circulate around within the visiting room. Visiting is strictly controlled and consists solely of sitting at a table talking with one another. Regulations which are posted require that all persons' hands remain on the tables."

As of this monitoring visit of October, 1998, the only change at Pahokee which has been implemented is that the visiting period has been increased from two hours to three hours. Institutional staff have no information on the issue of visiting park expansion.

Polk YDC — Facility staff advise that plans have been approved for expansion of the visiting area to include an outdoor patio with concrete slab and covered roof. The monitor was advised that two bids have already been received and one more bid is pending.

Visiting periods at Polk YDC remain two hours.

Recommendation: Visiting park expansions should be commenced concurrently at both facilities.

Recommendation: Polk YDC should expand visiting periods from two (2) to three (3) hours.

Recommendation: Additional steps should be taken to make the visitation area, policies and procedures more youth and family friendly.

SECTION II — THE RELEASE DECISION

Critics of for-profit correctional firms are concerned that these companies might manipulate release dates.

"One of the major concerns voiced is that private companies will have a vested interest in keeping their prisons filled to capacity to receive maximum payments...It also can lead to attempts to influence the length of incarceration through the prison discipline process, which would result in the reduction of good time, thus making sure that longer periods of incarcerations will be the rule rather than the exception." (Shichor, David. Punishment for Profit. Sage Publications, 1995, Page 158.)

Because of this concern, the Florida Legislature determined at the adult level, that matters affecting the release of inmates would not be delegated to private contractors.

Florida Statutes section 957.06 reads as follows:

"Powers and duties not delegable to contractor — *A contract entered into under this chapter does not authorize, allow, or imply a delegation of authority to the contractor to:*

(5) Make a decision that affects the sentence imposed upon or the time served by an inmates, including a decision to award, deny, or forfeit gain-time.

(6) Make recommendations to the Parole Commission with respect to the denial or granting of parole, control release, conditional release, or conditional medical release. However, the contractor may submit written reports to the Parole Commission and must respond to a written request by the Parole Commission for information.

(7) Develop and implement requirements that inmates engage in any type of work, except to the extent that those requirements are accepted by the commission.

(8) Determine inmate eligibility for any form of conditional, temporary, or permanent release from a correctional facility."

While the preceding were written for the adult sector, the same concern should exist regarding youth committed to DJJ. In fact, at the juvenile level, there are two ways in which a contractor can benefit from extending a youth's release date.

1. Per Diem — The State of Florida reimburses the vendor based upon the number of youth housed at the facility each day.

2. Educational Funding — The number and type of youth participating in school during "F.T.E. (Full Time Equivalency) Count Weeks" determine the amount of funding that will be received from the Department of Education.

The existing contract states:

"The PROVIDER shall not release any youth committed to the program without prior DEPARTMENT authorization" (Article 2.13).

However, the contract does not address the issue of a private contractor delaying the release dates of youth in order to generate additional per diem and educational reimbursements. It has been verified through youth, memos and independent conversations with key staff that this practice has occurred (see Appendix 1 for example).

Finding: Release dates of youth were delayed for the express purpose of having them present in the institution during "FTE Count Week". This increased the education funds and the per diem costs to the state. Additionally, it is an extreme disservice to youth who are otherwise eligible and scheduled for release who were retained at the facility.

Recommendation: It is recommended that DJJ retain the release decision and that this not be delegated to vendors.

SECTION III — CURRENT STATUS AND CONTINUING CONCERNS

Serious Incidents

Pahokee YDC — Since the July Special Report on this facility, the following three serious incidents have been verified:

1. A youth was attacked and severely beaten by three other youth over a gambling debt. Surgery was required and the youth's spleen removed.
2. A youth who was on suicide watch (one-on-one supervision) tied a sheet around his neck, ran up a flight of stairs, tied the sheet around a stair rail and jumped in an attempt to commit suicide.
3. Two youth who had a disagreement in the dining room were later allowed by staff to fight in the housing area for approximately 7-10 minutes. Staff did not intervene, did not report the incident and did not take the youth to medical. Four staff were terminated including two Team Leaders and two Youth Worker I's.

In addition to the verified incidents, there is concern regarding incidents which cannot be verified. It is noted that eleven youth suffered broken bones in July and August and reports on only five of the eleven could be located in the files. Of the five located, four involved youth "fighting."

In the previously referred to meeting of September 22, 1998, between DJJ and CSC, strict guidelines were adopted regarding the numbers of staff that would be present supervising youth on each shift. Additional full and part-time staff have been allocated so that these guidelines could be followed. Pending the employment of additional staff, the facility is relying on overtime to meet this need. The danger here is the possibility of staff burnout and adverse morale if staff are required to work too many hours.

Additionally, there is concern that in incident #3 above, two of the staff involved were Team Leaders. These are supposed to be the best and most experienced staff at the facility.

Comment: The earlier recommendations for increased entry level pay and a geographic pay differential are reiterated as a means of broadening the base from which the facility can recruit and attract qualified staff.

Recommendation: The recommendation made in the Special Report of July 1998 that this facility be authorized the position of Institutional Investigator is repeated.

Polk YDC — At the time of this monitoring visit, an investigation had just been completed confirming that an employee had been found to have used excessive force. He was alleged to have struck a youth with his fist and elbow during a "takedown." The facility was in the process of terminating the employee on the day of the exit conference.

Discipline and Behavior

Management Units

Polk YDC — This facility implemented a Behavior Management Unit and finalized its Facility Operating Procedure (see Appendix 2) during the monitoring visit. In conjunction with implementation of the unit, it is the expectation of the DJJ District Manager that the use of confinement will drop dramatically. The facility which had been operating under "Detention" standards for confinement must now comply with "Residential Commitment Services" standards.

Six youth were selected for the Behavior Management Unit which is located in the old confinement wing. The program was just getting underway and the educational component had not been implemented.

The Orientation Unit is being split with half the beds to be used for Orientation and the other beds being available for confinement. Two youth were in the confinement unit when this monitor visited. We were advised one of these youth, who is pending transfer to another facility, had been continuously confined from September 21 to October 13. This would appear to be contrary to DJJ policy as well as the facility's own operating procedure.

A practice was observed for the first time on this visit of staff requiring youth who misbehaved to lie on the floor on their stomach with their hands crossed behind their back, and their legs crossed and held upright. This was referred to by staff as the "timeout" position. I was shown no written criteria or guidelines for the use of this technique nor was I shown any authority from DJJ. The DJJ District Manager was advised of this practice during the exit conference.

Recommendation: Utilization of a "timeout" position such as described here should not be made without DJJ approval and strict written criteria and guidelines.

Pahokee YDC — This facility is also planning to implement a Behavior Management Unit. However, the DJJ District is of the understanding that the facility will have to discontinue the use of confinement altogether when this is done. Joint utilization of the Orientation wing for orientation and confinement does not appear to be under consideration.

Recommendation: It is recommended that the DJJ Regions and Districts involved consult so that the same conditions regarding confinement apply at both facilities.

As a follow-up to the July Special Report in Pahokee, it appears that the due process hearings which were not being held on a timely basis at that time are now being provided.

Health Care Services

As indicated in previous monitoring reviews, health care services are provided by a sub-contractor, Correctional Healthcare Solutions (CHS). The initial May 1997 monitoring report noted that the sub-contract called for substantially fewer nursing staff than the Exhibit 1 of the contract between CSC and DJJ. In fact, the nursing coverage is reduced by three staff allowing only one nurse on evening, night and weekend shifts. This deployment leaves the department/infirmery uncovered when the nurse is making medication rounds.

Even when Correctional Healthcare Solutions temporarily added additional staff they were unable to meet all the provisions of the contract for immunizations, HIV testing, education, etc. Polk discontinued immunizations entirely because the local health department that had been conducting "immunization fairs" lost their funding (extra staff was brought in September 8 and 9 and approximately two-thirds of the population has received some immunizations).

Although the DJJ contract is silent on the number of hours for the contract dentist it does specify a full-time dental assistant, and services are described as follows:

"(7) a system through which routine dental care is provided, including dental screening, development of dental treatment plans, oral hygiene education and cleaning, and the provision of necessary and appropriate dental treatment which includes emergency dental care and dental sick call provisions."

The sub-contract between CSC and CHS requires .15 FTE (6 hours per week) for the dentist and dental assistant. Pahokee does provide a dentist and dental assistant six hours weekly and was able to provide 45 on-site treatments in August. Polk has no dental assistant services. The dentist was only on-site 9.5 hours in September and treated just the worst emergencies.

A contract amendment signed 8-30-98 changes the reporting and vacancy clause for the health services area and eliminated staffing requirements. The monitors were advised by DJJ staff in both Districts that the emphasis is on services delivered, rather than required number of staff. This monitor was not provided any service delivery information during the last three visits and was told that computers at both facilities had "crashed." A reconstruction of some components of service delivery was provided during this review.

The Polk program has recently employed its fourth Health Service Administrator (HSA) and the Pahokee program hired an HSA prior to QA. The previous HSA was also the Clinical Coordinator for Correctional Healthcare Solutions and was responsible for implementing and supervising other Florida programs. The resulting initial review by NCCHC in April 1998, evidenced a need for additional documentation and/or implementation of 11 of 36 essential standards, including immunizations, dental screenings or CPR certification.

Recommendation: CSC immediately increase nursing coverage at both facilities and mandate that other minimum staffing specified in the sub-contract is maintained.

Recommendation: CHS maintain accurate, comprehensive and descriptive health care data that is utilized by facility administration and DJJ for operational decisions.

Recommendation: DJJ employ an independent team of medical experts to evaluate the health care services at both Polk and Pahokee YDCs.

Recommendation: On-site monitors play a greater role in the oversight of health care at each facility.

Recommendation: Vendor invoices should be reduced for staffing vacancies in health care.

Comments: As the number of large residential commitment facilities increases, DJJ may need to take a more active role in assuring that adequate and equivalent health care is provided in contracted residential facilities. Such a role would include adopting policies and procedures requiring:

- A. Minimum staffing patterns/ratios/professionals required by contract.*
- B. Established protocols for health care delivery.*
- C. Minimum expectations for dental services, immunizations, HIV testing, education, etc.*
- D. Review by an independent team of health care professionals looking at practice and quality of care issues on a regular basis.*

Neither NCCHC (National Commission on Correctional Health Care) or ACA (American Correctional Association) accreditation nor QA reviews can be relied upon as an indicator of comprehensiveness of service delivery, contract compliance or quality of care.

Mental Health Services

Both facilities are required by Article 2.8 of the contract to provide mental health services to:

"...include but not be limited to: formal mental health evaluations, substance abuse evaluations, suicide risk assessments, individual and group counseling, and individualized mental health treatment services for offenders; monitoring of psychotropic medication when applicable; and, emergency mental health evaluation and/or crisis stabilization."

The mental health staffing required by the contract of a Ph.D. psychologist and a MA psychologist is currently in place at Pahokee YDC. Polk is utilizing a Ph.D. psychologist and an MA in education for services. Both facilities utilize contracted psychiatric services: 16 hours per month at Polk, and 28 hours in September, 8 hours in August and 20 hours in July at Pahokee. As indicated in our July Special Report, "Whether or not this staffing is adequate to meet service demands is an issue that would have to be assessed by a qualified mental health professional." Such a review would include the number and type of mental health needs as well as an analysis of youth assigned with sex offenses.

An assessment of mental health services and mental health needs at both facilities is hampered by lack of data on service delivery. Neither facility has implemented the mental health on-site tracking logs or maintained the mental health and substance abuse statistical report as outlined in the March 1997 draft Mental Health Manual and

the final May 1998 manual. The need for this reporting has been discussed with various staff at all levels (facility and DJJ) and has been included in previous monitoring reviews.

Concerns continue regarding the number of youth on psychotropic medications (33 at Polk and 24 at Pahokee), the types and combinations of medications and the adequacy of monitoring of youth who are prescribed psychotropics. It does not appear that appropriate procedures are following regarding parental consent(s) and/or authority for evaluation and treatment.

An additional concern is raised by recent Quality Assurance evaluations of both facilities that are marked NA (not applicable):

"5.11 The program provides or makes arrangements for mental health services. NA

This indicator is rated as "not applicable" this year. The program does meet the requirements of this indicator."

Although indicating the standard was not reviewed, the Comment implies compliance with the indicator.

Recommendation: Reports on mental health encounters and services provided should be submitted to the Facility Administrator and to DJJ on a quarterly basis.

Recommendation: A qualified mental health team should conduct an assessment to determine whether current contractual levels of mental health staff are adequate, and whether other required policies, procedures, and practices are in place.

Comment: As the number of large contracted residential commitment facilities grows, DJJ may wish to consider a more standardized approach to mental health services that includes a state-wide formulary and protocols for treatment.

Comment: QA indicators in the area of mental health services should be expanded with qualified reviewers looking at actual treatment delivery.

Comment: Neither NCCHC or ACA accreditation can be relied upon as indicator of contract compliance or quality of treatment.

The Mental Health program has also been responsible for data collection for two of the six program outcome measures utilized by the Department to evaluate contract performance:

- "4. *"80% of youth completing program shall demonstrate improvement in self-controls manifested by a decrease in aggression. Such improvement shall be quantified by comparison between pre- and post-program completion testing using standardized instruments.*
5. *80% of youth completing program shall demonstrate improvement in the acquisition of and demonstration of pro-social and problem solving skills. Such improvements shall be quantified by comparison between pre- and post-program observation and testing using standardization instruments."*

Some testing has begun at both facilities but as has previously been suggested, DJJ may wish to review the instrument(s) to determine appropriateness. Additional data may also be required to meet the "program observation" component of the #5 outcome measure.

Recommendation: A panel of experts should be selected to make decisions on age-appropriate, widely accepted instruments to be utilized by all vendors in meeting contractual program outcomes and providing comparative data.

Educational/Vocational Programs

Since there are several other reviews of the various educational components, these monitors have focused on several key issues that seem to be of particular importance in auditing for-profit vendors. In the case of the juvenile facilities, the issue of budget and expenditures is of utmost concern since the private vendor has the opportunity to generate significant tax revenue through the FTE process. This money flows to the corporate office and until very recently, the educational programs at Polk and Pahokee had no budgets.

Each facility has just been provided a non-salary discretionary budget of between \$225,00-\$250,000. No audit process is in place to track monies received from the local school district(s) to the expenditures at the respective facilities. Despite the large sums generated by the educational programs, equipment and supplies have been slow in being approved and there is high teacher turnover, many teachers without certification and a continuing vacancy problem.

A contract amendment signed 8-30-98 changes the reporting and vacancy deduction clause for the educational program, thus removing 44 positions from the mandatory staffing pattern and deleting the requirement for reporting vacancies. This change does not allow for any oversight/penalties for continuing staff vacancies, even though FTE funding continues at the same level.

Questions have been raised in previous reports regarding the analysis of the educational program outcome measure:

"100% of youth shall demonstrate increases in educational skill levels. Measurement shall be quantified by standardized pre-and post-tests. At least 85% of the youth who complete the program and who are not identified as educationally handicapped shall either obtain a GED or improve by at least two (2) grade levels in reading, writing and math skills."

Both facilities are utilizing the TABE test and have only recently started submitting results. The TABE may not be the most appropriate measure for this age and ability level. Also, there is still some confusion on which section of the TABE test is to be utilized for the writing outcome measure since sub-tests are spelling and language.

A final Comment regarding the educational/vocational programs at both facilities concerns the overall program structure that mirrors the public school system. Since most youth at these facilities have been unsuccessful in traditional class settings, an effort should be made to provide more "hands-on," individualized knowledge and skills with an emphasis on literacy, basic math, and vocational aptitude. Many of these youth will never return to the classroom and the emphasis on "credits earned" may not be the most useful approach. Although GED classes do not earn FTE dollars it would seem that many more youth could benefit from this effort.

Recommendations: Under the current reimbursement system, vendors should be contractually required to submit line item budgets which verify that funds generated by the population at each facility are expended on staff/equipment/programs at that facility. Such expenditures should be subject to continual review and documentation including an audit by DJJ on a regular basis.

Recommendation: Educational programs within DJJ facilities should utilize testing that is accepted state-wide for this age group and is further modified by performance level. Contractual program outcomes should be based on this data and standardized expectations should be placed on all vendors.

Recommendation: Vendor invoices should be reduced for staffing vacancies in the education/vocational programs.

Food Service

Menu — The annual revision of the menu for both Polk and Pahokee was completed in July with the actual implementation of the changes taking place around August 15. Revisions were based on a survey of youth and were intended to make the food more "youth friendly." Examples of some of the changes are:

- French fried potatoes added
- Biscuits and garlic toast substituted for bread
- Replaced breaded veal patty with chow mein
- Added Jell-O
- Increased canned chilled fruit
- Increased breakfast syrup and jelly
- Hoagies substituted for turkey salad
- Corn chips added
- Nacho chips substituted for flat tortillas

Comment: Adaptation of the standard menu to a youth population is a very positive step. It is hoped that such efforts will continue.

Polk YDC — Food Service Inspections by the county health department were conducted on 5-20-98 and again on 9-23-98 (this inspection was continued and completed on 9-28-98). These reports are enclosed as Appendix 3.

The most obvious discrepancy noted by this monitor was the extremely poor condition of the kitchen floor. It is difficult to clean and this should be corrected as soon as possible.

Pahokee YDC — A Food Service Inspection was conducted on 9-21-98 and only two deficiencies were found (see Appendix 4).

Emergency Preparedness

Pahokee YDC — Complete emergency preparations were taken in anticipation of the arrival of Hurricane Georges in September 1998. This was actual preparation for a real emergency, and the only reason it is now referred to as a "drill" is that the hurricane did not arrive. Select memorandums concerning this emergency preparation are included as Appendix 5.

Preparations appear to be quite complete and staff are to be recognized for doing a thorough job. The only additional suggestion that can be made by this monitor is that a complete "after action" report be prepared which will serve as a guide for future training or actual situations.

Religious Program

Polk YDC — This facility appears to have an extremely full program of religious activities headed up by an energetic Chaplain. The downside of this success is that the number of youth desiring to attend Sunday Chapel services has exceeded available space in the Chapel. As a result, the monitor was informed that some youth were only allowed to attend services every other week.

Recommendation: The facility should assure that every youth who desires to attend religious services is afforded that opportunity on a weekly basis.

Youth Welfare Funds

An independent audit of the Youth Welfare Fund has not been conducted at either facility as required by Article 4.7 of the contract. The fund at Polk YDC was reviewed by the CSC Business Manager and she concluded that a total of \$852.28 should be reimbursed to the Welfare Fund for inappropriate expenditures.

Recommendation: The contractually required "independent audits" at both facilities should be completed.

Maintenance and Fire Safety

Perimeter Alarm System - Polk YDC — The facility was struck by lightening on August 15 and since then the perimeter alarm has failed to operate despite several attempts to repair the system. The manufacturer has been notified and is sending another technician to attempt to correct the problem. In the meantime, the facility has placed a vehicular patrol on the perimeter 24 hours per day.

Fire Safety — The State Fire Marshal conducted a Fire Safety Survey at Polk YDC on 8-10-98 and no deficiencies were noted (see Appendix 6).

The Palm Beach School District conducted a "Comprehensive Safety Inspection" of the Pahokee YDC school on September 2, 1998. Five deficiencies were noted as shown in Appendix 7. A corrective action plan is required within 60 days.

APPENDIX 1

Memorandum

DATE: September 23, 1998

TO: Case Managers

FROM: Ms. Marsh

RE: FTE week

CC: Mr. Williams *MW*

LAST NAME	FIRST NAME	SSN	DISTRICT	PROJ DATE	POD	GROUP	CASE
Williams	Anthony	50444-10002	01	10/06/98	E-3	B	Dixon
Washington	James	50444-10003	10	10/06/98	E-2	C	Washington
Osborne	James	50444-10006	13	10/06/98	D-2	C	Osborne
Miller	James	50444-10002	10	10/06/98	D-3	B	D. Miller
Murray	James	50444-10007	07	10/08/98	D-4	D	Murray
McKim	James	50444-10002	04	10/08/98	D-1	D	McKim
McKim	James	50444-10004	04	10/08/98	D-1	D	McKim
Sheffer	James	50444-10004	07	10/08/98	E-1	A	Sheffer
Sheffer	James	50444-10004	06	10/08/98	E-1	A	Sheffer
Milican	Anthony	50444-10006	14	10/08/98	E-2	E-2	Milican

Due to FTE week the youth listed above will not be released during the week of 10/05/98 - 10/09/98.

Please set the youth date for the week of 10/12/98 - 10/16/98.

If you have any questions Please contact Mr. Williams.

Thank You
Ms. Marsh
Ms. Marsh